

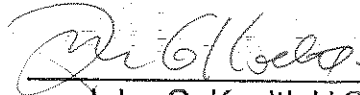


APPLICATION GRANTED.  
SO ORDERED

December 3, 2021

By ECF

The Honorable John G. Koeltl  
United States District Judge  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, New York 10007



John G. Koeltl, U.S.D.J.

12/3/21

**Re: United States v. James Jeremy Barbera, 21-CR-154 (JGK)**

Dear Judge Koeltl:

We represent James Jeremy Barbera in the above-referenced matter.

We write jointly on behalf of both parties to respectfully request a two-week extension of the briefing schedule in connection with the motions *in limine*. The government and the defense have conferred this week concerning discovery issues and have exchanged additional discovery. The government is expected to provide the defense today with notice under Rule 404(b) of the Federal Rules of Evidence, which, along with the recent discovery exchanged, will assist the parties in identifying more precisely the issues to be addressed in the respective parties' *in limine* submissions. In light of the trial date now firmly scheduled for February 14, 2021, the parties agree that a two week extension of the briefing schedule for motions *in limine* would enable more informed and focused submissions. We therefore jointly request that the Court approve the following changes to the briefing schedule:

- The deadline for submitting motions *in limine* shall be extended by two weeks from December 6, 2021 to December 20, 2021.
- The deadline for submitting responses to motions *in limine* shall be extended by two weeks from December 20, 2021 to January 3, 2021.

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The parties do not request an adjournment of the submissions and responses to submissions of the parties' respective proposed jury instructions and *voir dire* questions to prospective jurors, which would remain December 6 and December 20, 2021 respectively.

This is the third request for an extension of the briefing schedule for the parties' motions *in limine*. The Court previously granted Mr. Barbera's unopposed motions to extend the briefing schedule.

Respectfully,

/s/ Eric M. Creizman

Eric M. Creizman (EC7684)

cc: Assistant United States Attorneys Joshua Naftalis, Kiersten Fletcher,  
and Daniel Loss (by ECF and email)